

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

UNOPPOSED MOTION TO IMPOUND/SEAL DESIGNATED MATERIAL

Pursuant to Local Rule 7.2 and the Order entering the Protective Order in this case (“Protective Order”), ECF No. 87, Defendant Google LLC (“Google”), respectfully requests the Court to impound (seal) an un-redacted copy of Google’s Reply in Support of Its Motion for Leave to Amend Its Answer and Affirmative Defenses to Plaintiff Singular Computing LLC’s Amended Complaint (Dkt. 350) (“Reply”).

Plaintiff Singular Computing LLC (“Singular”) does not oppose this Motion to Impound/Seal.

The Protective Order allows a party to designate documents and deposition transcripts as “Confidential” after making a good-faith determination that the documents and/or deposition transcripts contain information that is “confidential, proprietary, and/or commercially sensitive information.” Protective Order ¶¶ 6-7. The Order further requires that a party intending to make court filings referring to “Confidential” information bring a motion to impound. *Id.* ¶ 14.

Google’s Reply contains quotes from and descriptions of documents and/or deposition transcripts that Singular has designated as confidential.

Submission of the above-identified confidential version of the Reply is necessary to permit the Court to fully evaluate the issues raised in Google's Motion for Leave to Amend Its Answer. Google therefore brings this Motion to Impound to impound the confidential and unredacted versions of the above-identified document.

For the foregoing reasons, Google respectfully requests that the Court permit it to file the above-identified document under seal because Singular has taken the position that the documents and deposition testimony quoted or referenced in this document contain Singular's confidential business information. Google further requests that the document remain impounded until further order by the Court, and that upon expiration of the impoundment that the document be returned to Google's counsel.

Respectfully submitted,

Dated: July 15, 2022

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LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Nathan R. Speed, counsel for Defendant Google LLC, hereby certify that counsel for Google conferred with counsel for Singular on June 12, 2022, and counsel for Singular indicated they do not oppose the relief sought in this motion.

/s/ Nathan R. Speed
Nathan R. Speed

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Gregory F. Corbett

Gregory F. Corbett